

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

Adams, individually and on behalf of	:	
other members of the general public	:	
similarly situated,	:	Civil Action No. 2:22-cv-3132
	:	
Plaintiff,	:	Judge Michael H. Watson
	:	
v.	:	Magistrate Judge Kimberly A. Jolson
	:	
Liberty Healthcare Services, LLC, et	:	
al.	:	

**JOINT MOTION FOR CONDITIONAL CERTIFICATION AND TO APPROVE THE  
PARTIES' PROPOSED NOTICE AND CONSENT**

Now comes Plaintiff Misti Adams (“Named Plaintiff”), on behalf of herself and all others similarly situated, and Defendants Liberty Healthcare Services, LLC, Liberty Healthcare Services, LLC Plus, Chanthou Phay, and Gail Bounemany (“Defendants”) (collectively Named Plaintiff and Defendants will be referred to as the “Parties”), and hereby jointly stipulate to conditionally certify a collective action pursuant to 29 U.S.C. § 216(b) and move this Court to approve the attached Notice and Consent Form<sup>1</sup> to be sent to the putative collective members who are defined as:

**All current and former hourly, non-exempt employees who provided in-home care and/or other in-home services for Liberty Healthcare and were paid for at least forty (40) or more hours in any single workweek from October 25, 2019 to present (“Potential Opt-Ins”).**

The Parties will provide notice to the Potential Opt-Ins in accordance with the following schedule:

1. The Parties jointly submit as **Exhibit A** the proposed Notice and Consent to Join forms (“Notice Packet”) to be authorized by the Court;

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<sup>1</sup> See **Exhibit A**.

2. Within 21 days of the Court's entry of an Order approving the Parties' Notice Packet, Defendants shall provide to Named Plaintiff's Counsel a list (in Microsoft Office Excel format) containing the names, last known addresses (including zip code), phone numbers, and personal email addresses (if available) of the Potential Opt-Ins.

3. Named Plaintiff's Counsel will mail and email the Notice Packet to the Potential Opt-Ins within 14 days of receiving the list. Named Plaintiff's Counsel will text the Notice Packet to any Potential Opt-Ins for whom Defendants do not have a valid email or mailing address and/or will obtain a valid mailing or email address for such Potential Opt-Ins. The Potential Opt-Ins shall have 60 days from the date the Notice Packet is sent to return their Consent to Join form and opt-in to this case.

Respectfully submitted,

/s/ Matthew J.P. Coffman

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*Attorney for Defendants*

*Attorneys for Named Plaintiff  
and those similarly situated*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 9th day of December 2022, a true and accurate copy of the forgoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Peter Contreras  
Peter Contreras (0087530)